

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Yisel Dean, Administratrix of the Estate of )  
Steven Dean, deceased, et al., )

Plaintiff, )

vs. )

Raytheon Company, a Delaware Corporation, )  
Raytheon Aircraft Holdings, Inc., a Delaware )  
Corporation, Raytheon Aircraft Company, a )  
Kansas Corporation, Raytheon Aircraft Credit )  
Corporation, a Kansas Corporation, Colgan Air )  
Inc., a Virginia Corporation d/b/a US Air )  
Express, )

Defendants. )

Case No.: 05 CV 10155 PBS

**MOTION FOR ADMISSION OF**

**ATTORNEY MARY SCHIAVO PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), Robert McConnell, a member of the bar of this court and attorney for Plaintiff Yisel Dean, moves to admit attorney Mary Schiavo to the bar of the Court *pro hac vice*. In support of this Motion, the undersigned states that:

1. I am a member of Motley Rice LLC, 321 South Main Street, Providence, Rhode Island 02940, attorney for petitioner, am admitted to practice and am a member in good standing of the Bar of this Court.
2. Mary Schiavo is a lawyer with the firm Motley Rice LLC, 28 Bridgeside Boulevard, Mount Pleasant, South Carolina 29464.
3. Mary Schiavo is a member in good standing of the Bar of in the Missouri, the Maryland, District of Columbia Court, and the United States Supreme Court.

4. An affidavit from the attorney accompanies this application and is attached.
5. Mary Schiavo is not currently the subject of any disciplinary proceedings as a member of any bar
6. Mary Schiavo is familiar with the Local Rules for the United States District Court for the District of Massachusetts.

The Plaintiff has assented to this motion.

**WHEREFORE**, I respectfully request that this motion for admission of Mary Schiavo, attorney for plaintiffs, *pro hac vice*, be granted.

July 21, 2005

Respectfully Submitted,

/s/ Robert McConnell

Robert McConnell (BBO No. 550625)

Motley Rice LLC

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**AFFIDAVIT OF MARY SCHIAVO**

1. I, Mary Schiavo, on my oath swear and depose:
2. I am an attorney with the law firm of Motley Rice LLC located at 28  
Bridgeside Boulevard, Mount Pleasant, South Carolina 29464.
3. I am forty-nine (49) years of age, being born on September 4, 1955 in Pioneer,  
Ohio.
4. I was admitted to the Missouri Supreme Court on September 13, 1980, the  
Maryland Court of Appeals on June 23, 1994, the District of Columbia Court of Appeals  
on December 6, 1993, and the Supreme Court of the United States on October 1, 1990.
5. I am in good standing in every jurisdiction where I have been admitted to  
practice. I am not currently suspended or disbarred in any jurisdiction. No disciplinary  
proceedings are pending against me in any jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

7. My firm represents Plaintiff Yisel Dean in the above-captioned matter and I respectfully request admission to the Bar of this Court *Pro Hac Vice*.

Signed under the penalties of perjury this 19 day of July, 2005.

/s/ Mary Schiavo

Mary Schiavo